



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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July 2, 2020

BY ECF

The Honorable Loretta A. Preska
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The case schedule proposed below is approved.
SO ORDERED.
Dated: July 6, 2020

LORETTA A. PRESKA, U.S.D.J.

Re: Allen v. New York State Dep't of Corr. and Cmty. Supervision,
19 Civ. 8173 (LAP)

Dear Judge Preska:

The New York State Office of the Attorney General ("OAG") represents defendants Carl Koenigsmann, John Morley, Susan Mueller, David Dinello, John Hammer, and Kristin Salotti (together, "State Represented Defendants") in the above-referenced action. I write on behalf of all parties to respectfully request a forty-five day stay of class discovery and extension of the deadlines in the April 17, 2020 scheduling order while the parties continue to explore the possibility of resolution of this matter with the assistance of Magistrate Judge Netburn.

The case schedule would be amended as follows:

- Parties Exchange Initial Disclosures and Rule 26(a)(2)(C) Disclosures currently due July 15, 2020 would be due August 31, 2020;
- Parties Exchange Expert Reports currently due August 3, 2020 would be due September 17, 2020;
- Parties Exchange Rebuttal Expert Reports currently due September 2, 2020 would be due October 19, 2020;

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- Plaintiffs File Moving Papers for Their Motions for Preliminary Injunction, for Class Certification, and to Intervene currently due September 16, 2020 would be due November 2, 2020;
- Defendants File Opposition Papers currently due November 2, 2020 would be due December 17, 2020; and
- Plaintiffs File Reply Papers currently due November 16, 2020 would be due December 31, 2020.

During this period, the parties will continue exchanging medical records for the named Plaintiffs on a rolling basis.

Thank you for your consideration.

Respectfully submitted,

/s/ Brendan M. Horan
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cc: Counsel of Record (**by ECF**)